

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF

ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

v.

ELVIN RATLIFF

KC FILED  
FEB 08 2008

MAGISTRATE JUDGE VALDEZ

MICHAEL W. DOBBINS  
CLERK, U.S. DISTRICT COURT  
CRIMINAL COMPLAINT  
CASE NUMBER

08CR 0121

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about October 2, 2007 in Cook County, in the Northern District of Illinois defendant,

did sell, exchange, transfer, and deliver a false, forged and counterfeit obligation or security of the U.S., namely 50 counterfeit \$100.00 federal reserve notes, with the intent that the same be passed, published, or used as true and genuine.

in violation of Title 18 United States Code, Section 473.

I further state that I am a Special Agent with the Secret Service and that this complaint is based on the following facts:

SEE ATTACHED AFFIDAVIT.

Continued on the attached sheet and made a part hereof: X Yes      No

Terry McCabe  
Terry McCabe, Complainant

Sworn to before me and subscribed in my presence,

February 8, 2008  
Date

at Chicago, Illinois  
City and State

U.S. Magistrate Judge Maria Valdez  
Name & Title of Judicial Officer

Maria Valdez  
Signature of Judicial Officer

STATE OF ILLINOIS     )  
                                      )  
COUNTY OF COOK       )     SS

**AFFIDAVIT**

I, Terrence McCabe, being duly sworn under oath, deposes and states the following:

1. I am a Special Agent of the United States Secret Service, assigned to the Chicago Field Office, Chicago, Illinois. I have been employed with the Secret Service since May 2003 and have investigated numerous financial crimes, identity theft cases and counterfeit Federal Reserve Note cases.

2. This affidavit is based on my personal knowledge, as well as information obtained from documents, law enforcement records, witnesses, the written and verbal statements from cooperating defendants, and other law enforcement officials.

3. This affidavit does not contain all the information known to me regarding this investigation, but rather, contains only those facts believed to be necessary to establish probable cause.

**BACKGROUND**

4. The Secret Service is currently involved in an ongoing investigation into the counterfeiting activities of Cleveland Jones. Jones was identified to the Secret Service by confidential informants ("CIs"). As the case against Jones was being developed, it became apparent that an associate of his, Elvin RATLIFF, the subject of this affidavit, was also trafficking in counterfeit currency. Once the Secret Service became aware of RATLIFF's activities, we began actively investigating him as well. This investigation has resulted in the accumulation of evidence establishing probable cause that RATLIFF violated Title 18, United States Code, Section 473.

**FIRST BUY- OCTOBER 2, 2007**

5. On October 2, 2007, a CI <sup>1</sup> made a consensually recorded telephone call to Elvin RATLIFF. During this call, RATLIFF agreed to sell the CI \$5,000 in counterfeit \$100 federal reserve notes ("FRNs") in exchange for \$1,500 in genuine currency. The CI and RATLIFF agreed to meet at 11422 S. Harvard, Chicago, IL, at approximately 1:00 PM that day.

6. Prior to meeting with RATLIFF, the CI was searched by agents for evidence and/or contraband. None was found. The meeting was both audio taped, via a recording device on the CI, and videotaped by the agents conducting surveillance. During the meeting between the CI and RATLIFF, the CI exchanged \$1,200 of genuine currency for \$5,000 in counterfeit \$100 FRN's from RATLIFF. After this exchange, the CI asked whether RATLIFF could provide more counterfeit FRNs if the person for whom the CI was allegedly buying the counterfeit FRNs was satisfied with the quality of the FRNs. RATLIFF stated "we could have more ready by 10:00 PM tonight."<sup>2</sup> The CI told RATLIFF that he/she would call him (RATLIFF) later on in the week and let him know if he/she wanted to buy more.

7. Following this meeting, the CI met with agents at a pre-arranged location. The CI provided SA McCabe with the \$5,000.00 in counterfeit \$100 FRN's, all bearing serial number ("SN") FG0859712A. SA McCabe examined these notes and, based upon his training and

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<sup>1</sup>The CI was arrested by the Matteson Police Department for passing counterfeit Federal Reserve Notes. He/She has been cooperating with the Secret Service in an effort to have his/her charges reduced by the State. This is the first time the Secret Service is working with this CI, however, he/she has proven reliable during this investigation. The agent handling the CI has verified information provided by the CI through other sources and the information has always been accurate.

<sup>2</sup>This quote is derived from the case agent's review of the audio recording of the meeting between the CI and Ratliff.

experience, verified them as counterfeit, opining they had been manufactured by ink jet on bleached genuine currency.

#### **SECOND BUY- OCTOBER 5, 2007**

8. On October 4, 2007, agents met with the CI and instructed the CI to place a consensually recorded telephone call to RATLIFF. During this call, the CI agreed to pay RATLIFF \$2,400 in genuine currency in exchange for \$8,000 in counterfeit \$100 FRN's. A meeting was arranged for the next day, October 5, 2007, at 11422 S. Harvard, Chicago, IL.

9. On October 5, 2007, the CI made a consensually recorded phone call to RATLIFF in order to confirm the meeting. During this conversation, RATLIFF told the CI to meet him at RATLIFF's sister's residence, located in South Holland IL. Prior to departing for the meeting, the CI, as well as his/her vehicle, was searched for evidence and/or contraband. None was found. The CI was provided with a recording device which captured the conversation between the CI and RATLIFF during the meeting. Surveillance photos were also taken of the meeting between the CI and RATLIFF.

10. The CI's vehicle was surveilled as he/she drove to the South Holland location. Upon arrival at the South Holland location, the CI exchanged \$2,400 in genuine currency for \$8,000 in counterfeit \$100 FRN's from RATLIFF. After this exchange, the Secret Service met the CI at a pre-arranged location where the CI provided SA McCabe the \$8,000.00 in counterfeit \$100 FRN's, all bearing SN FG0859712A, the same SN from the October 2, 2007 transaction. SA McCabe examined these notes and, based upon his training and experience, verified them as counterfeit, opining they had been manufactured by ink jet on bleached genuine currency.

#### **THIRD BUY- NOVEMBER 2, 2007**

11. On November 2, 2007, the CI made a consensually recorded telephone call to RATLIFF. During this call, RATLIFF agreed to sell him/her \$10,000 in counterfeit \$100 FRN's in exchange for \$3,000 in genuine currency. RATLIFF and the CI arranged to meet later that day at the same location they had met for the October 5, 2007 transaction.

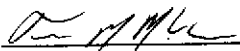
12. Prior to departing for the meeting, agents searched the CI, as well as his/her vehicle, for evidence and/or contraband. None was found. The CI was provided with a recording device which captured the conversation between the CI and RATLIFF during the meeting. Surveillance photos were also taken of the meeting between the CI and RATLIFF. During the meeting, the CI exchanged \$3,000 in genuine currency for \$10,000 in counterfeit FRNs from RATLIFF.

13. After this exchange, the Secret Service met the CI at a pre-arranged location where the CI provided SA McCabe the \$10,000.00 in counterfeit \$100 FRN's, all bearing SN FG0859712A. SA McCabe examined these notes and, based upon his training and experience, verified them as counterfeit, opining they had been manufactured by ink jet on bleached genuine currency. These counterfeit FRNs bore the same SN as the FRNs purchased by the CI from RATLIFF on the two previous occasions. Each FRN should have a distinct SN from any other FRN of the same denomination.

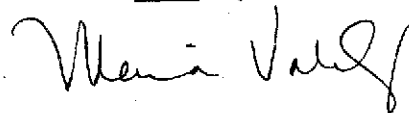
#### CONCLUSION

14. Based on the foregoing, I believe there exists probable cause to believe that Elvin RATLIFF violated Title 18, United States Code, Section 473.

FURTHER AFFIANT SAYETH NOT

  
Terrence McCabe  
Special Agent  
U.S. Secret Service

Subscribed to and sworn before  
me this 8<sup>th</sup> day of February, 2008



MARIA VALDEZ  
U.S. Magistrate Judge